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June 3, 2025

VIA ECF

Hon. Andrew E. Krause, U.S.M.J.
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

**Re: *Project Veritas et al. v. O'Keefe et al.*, No. 23-CV-04533-CS-AEK
(S.D.N.Y.)**

Dear Judge Krause:

I write as counsel for Counter-Claim Defendants Project Veritas and Project Veritas Action Fund (collectively, "PV"), to request an emergency teleconference to discuss the upcoming deposition of Mr. Benjamin Wetmore, in his individual capacity and as a representative of PV, scheduled to occur on June 5, 2025 and June 6, 2025.

While the parties previously agreed to conduct Mr. Wetmore's deposition in-person in White Plains, New York, and Mr. Wetmore had every intention of fulfilling this agreement, due to serious, unexpected medical issues, Mr. Wetmore believes he is unable to make the eleven-hour (plus) drive from Michigan to New York in time for the deposition. Specifically, Mr. Wetmore has severe arthritis, caused by a car accident many years ago, which has unexpectedly flared up, rendering it difficult for him to drive for long periods of time.

PV respectfully requests that the Court conduct an emergency teleconference to discuss this issue, before Mr. Wetmore must commit to the eleven-hour (plus) drive. Mr. Wetmore is available to attend telephonically.

The undersigned notes that Mr. Wetmore is not asking that the Court postpone the deposition, but rather, that the deposition occur either in Michigan, where Mr. Wetmore resides, or remotely. Counsel for the parties met-and-conferred this afternoon, but have been unable to resolve this issue on their own.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael J. Harris", written in a cursive style.

Michael J. Harris